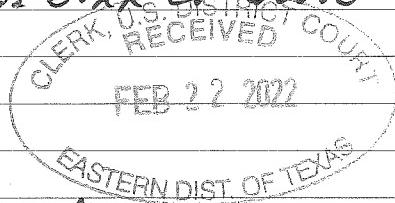


IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF TEXAS - TYLER DIVISION

Mr. JAMON NATHANIEL HESTAND
Plaintiff

V.
TDCJ-CID, et.al.
Defendants

Civil Action No. 6:22-cv-00006



MOTION FOR APPOINTMENT OF COUNSEL

Pursuant to 28 U.S.C. 1915(e)(1), Plaintiff moves for an order appointing Special Counsel to represent him in this Case. Plaintiff also moves the Court in the interest of justice to appoint Special Counsel to represent him in this Case, that can fully handle the extreme complexity of this Case as presented upon the Complaint, the supporting affidavits, and documentary evidence in their entirety along with being fully capable of working with a Client who has mental & physical disabilities that adversely affects his major Life Activities in many ways simultaneously. Plaintiff further moves the Court to appoint Special Counsel to represent him in this Case that has no conflict of interest in representing Plaintiff properly & ethically in this Case. In support of this Motion, Plaintiff states:

#1 Plaintiff is unable to afford Counsel and is In Forma Pauperis in this Case already.

#2 Plaintiff's imprisonment will greatly limit his ability to litigate properly. The issues involved in this Case are extremely complex and will require very significant research and investigation. Plaintiff has limited access to the Law Library in Solitary Confinement. Expert testimony will most definitely be needed. There is a very large amount of Defendants in this Case and they must be Served Process properly for Summons which is most extremely difficult for Plaintiff to do alone to the point of impossibility especially when many of the Defendants listed have a history of evading Service on purpose. The Defendants in this Case have actually tortured Plaintiff relentlessly and Conspired against his rights continuously in such a way/ways that their actions were & are Felony in nature.

Plaintiff is physically injured and in continuous pain. Plaintiff is mentally ill. Plaintiff's disabilities do adversely affect his major Life Activities both physically & mentally.

#3) A trial or trials in this Case will definitely involve conflicting testimony where credibility will be a major issue, and Counsel would better enable Plaintiff to present evidence and cross examine witnesses.

#4) Plaintiff had Legal Counsel for Case #6:20-cv-00071 before the Plaintiff refiled his Complaint which changed the Case # to Case # 6:22-cv-00006 as it is now. Plaintiff has wrote many Legal Individuals & Groups for help in the short period of time so far to no avail as of yet such as : Attorney Jeff Blackburn / Texas Civil Rights Project / Jailhouse Lawyers Initiative / Jailhouse Lawyers Speak / and even tried to get Attorney Tanika J. Solomon back on Plaintiff has made repeated efforts to obtain Legal Counsel and is trying to get the American Civil Liberties Union involved but so far Plaintiff has been unable to obtain Legal Counsel for this Case.

WHEREFORE, Plaintiff request that the Court appoint the "American Civil Liberties Union" to represent him in this Case as Legal Counsel.

"I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

*Executed On: February 15th, 2022

Jamon Nathaniel Hestand
Jamon Nathaniel Hestand
TDCJ-CID#1343536"